

# **EXHIBIT A**

Blozis  
Linda J. Blozis, Volume 1

v.  
C.A. # 05-891 (SLR)

Mellon Trust of Delaware, et al.  
July 26, 2006

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1 stunned and shocked that a manager would talk to a  
2 woman in that manner.  
3 Q. So, Ms. Blozis, you believe in that closed door  
4 meeting that you were referring to that Mr. Gilmore  
5 during the course of the discussion used the terms  
6 goddamn it and shit?  
7 A. To the best of my recollection, yes.  
8 Q. And I think you testified that you're not  
9 certain of the exact exchange?  
10 A. Yes.  
11 Q. Had you heard Mr. Gilmore use profanity before?  
12 A. Regrettably, yes.  
13 Q. The same terms?  
14 A. Yes.  
15 Q. And where had you heard him?  
16 A. As I recall, it may have been behind the closed  
17 doors when Bill Becker was the investment officer and  
18 Brendan would be in with him, with Martha Fetters when  
19 she was an investment officer and perhaps at team  
20 meetings, unfortunately.  
21 Q. During the team meetings that he would be  
22 holding with the rest of his team?  
23 A. Yes.  
24 Q. He would say goddamn it or shit during the team

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1 meetings?  
2 A. As I recall, occasionally, yes.  
3 Q. Would he be using it as emphasis?  
4 A. I can't say at this time. I don't recall.  
5 Q. Now, you said that you had overheard him using  
6 the same terms with Becker and Fetters?  
7 A. Martha Fetters.  
8 Q. And Becker?  
9 A. Yes.  
10 Q. Now, during the periods that you overheard him  
11 using those terms with Becker and Fetters, did you  
12 ever go to anybody to complain?  
13 A. I don't understand who you mean by "anybody."  
14 Q. Well, HR, for example?  
15 A. At this time I would say I recall not having a  
16 good rapport with HR.  
17 Q. At what point did you feel that you didn't have  
18 a good rapport with HR?  
19 A. Linda Squier and I and other Delaware team  
20 members wanted to discuss an incident years prior to  
21 this regarding the conduct of a sales officer. We  
22 understood it to be a confidential meeting. The HR  
23 director at that time brought in other officers that  
24 were above Linda Squier and I besides herself.

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1 Q. Who was the HR director that you're referring  
2 to?  
3 A. Rosemary Thomas.  
4 Q. And you said you had gone to her about a sales  
5 officer?  
6 A. Yes.  
7 Q. When did you go to her?  
8 A. As I recall, it would have been in the mid to  
9 late nineties.  
10 Q. And what was the issue with the sales officer?  
11 A. I don't recall specifically at this time. To  
12 my recollection, he was telling clients, he was  
13 telling clients Mellon would deliver on different  
14 items that were really not Mellon policy.  
15 Q. And --  
16 A. Prospective clients.  
17 Q. Who was the sales officer?  
18 A. Anthony Jasienski.  
19 Q. Was he working out of the Delaware facility?  
20 A. Is he working?  
21 Q. At the time.  
22 A. At the time, yes.  
23 Q. And you said that you and Linda -- I'm sorry --  
24 you and Ms. Squier had gone to Rosemary to complain

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1 about Anthony and you felt that it was in confidence  
2 and then I guess there were other people who were  
3 aware of it?  
4 A. Yes.  
5 Q. And you felt that she shouldn't have told  
6 anybody else about it?  
7 A. Yes.  
8 Q. The people who were aware, were they Anthony's  
9 I guess for lack of a better word bosses or  
10 supervisors?  
11 A. One of them would have been, yes.  
12 Q. And who was the other one?  
13 A. To the best of my recollection, Brendan Gilmore  
14 was there, Brendan's supervisor Douglas Kloppenburg  
15 and the regional sales manager of Tony Jasienski at  
16 the time. I don't recall his name.  
17 Q. And why did you feel that those individuals  
18 shouldn't have been made aware of it?  
19 A. Ms. Squier and I approached HR in confidence.  
20 We were assured that it would be a confidential  
21 discussion between Rosemary Thomas, Linda Squier and  
22 myself and Rosemary Thomas showed up with the three  
23 officers, additional three officers.  
24 Q. Did you then tell your sort of story to the

24 (Pages 90 to 93)